MALCOLM PIRNIE

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

NJD049644438

Diamond Aerosol Corporation	87
Site Name	**Site ID Number**
Woodglen & Anthony Road	Glen Gardner, Hunterdon, NJ
Address	**City, State**

Date of Off-Site Reconnaissance February 13, 1985

SITE DESCRIPTION

Diamond Aerosol Corporation manufactures products including fragances, cosmetics, caulking compound, lens cleaner, and tear gas. Hazardous wastes result from some of these processes. Soil and ground water on-site have been contaminated by organic chemicals. Ground water off-site was found to contain methylene chloride.

Approximately 20 years ago, the site was occupied by a chemical research company that allegedly buried drums on-site and discharged waste into a subsurface disposal system.

PRIORITY FOR FURTHER ACTION: High ____ Medium __X__ Low ____ None ____

RECOMMENDATIONS

A medium priority is recommended for this site. As of December 1984, all drums stored on site were being removed and all hazardous waste disposed of illegally was being excavated. Cleanup procedures and the present status of hazardous substances on-site should be monitored.

200076

Prepared by: Soterios Stavrou **Date:** February 14, 1985

Of: JRB Associates

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION
01 STATE: NJ | 02 SITE NUMBER: 87

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site): Diamond Aerosol Corporation

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER: Woodglen & Anthony Roads

03 CITY: Glen Gardner

04 STATE: NJ | 05 ZIP CODE: 08826 | 06 COUNTY: Hunterdon | 07 COUNTY CODE | 08 CONG. DIST.

09 COORDINATES: LATITUDE 40 45 09.0 | LONGITUDE 74 53 21.0

BLOCK 57 LOT 23

10 DIRECTIONS TO SITE (Starting from nearest public road): Rt. 78 to Rt. 31 North to Buffalo Hollow Rd. Turn left onto Bunnvale Rd. Turn right onto Hill Rd. and make an immediate left onto Woodglen Rd. Take Woodglen Rd. to Anthony Rd.

III. RESPONSIBLE PARTIES

01 OWNER (If known): Diamond Aerosol

02 STREET (Business, mailing, residential): Woodglen & Anthony Rds.

03 CITY: Glen Gardner

04 STATE: NJ | 05 ZIP CODE: 08826 | 06 TELEPHONE NUMBER: (201)-8327128

07 OPERATOR (If known and different from owner): Ralph Helmrich, Vice President

08 STREET (Business, mailing, residential): Woodglen & Anthony Roads

09 CITY: Glen Gardner

10 STATE: NJ | 11 ZIP CODE: 08826 | 12 TELEPHONE NUMBER: (201)-8377128.

13 TYPE OF OWNERSHIP (Check one)

[X] A. PRIVATE [ ] B. FEDERAL _____ (Agency name) [ ] C. STATE [ ] D. COUNTY [ ] E. MUNICIPAL

[ ] F. OTHER _____ (Specify) [ ] G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

[ ] A. RCRA 3001 DATE RECEIVED: ____ (MONTH DAY YEAR) [X] B. UNCONTROLLED WASTE (CERCLA 103c) DATE RECEIVED: 06/05/81 (MONTH DAY YEAR) [ ] C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

[X] YES DATE 11/07/83 (MONTH DAY YEAR) [ ] NO

BY (Check all that apply)

[ ] A. EPA [ ] B. EPA CONTRACTOR [X] C. STATE [ ] D. OTHER CONTRACTOR

[ ] E. LOCAL HEALTH OFFICIAL [ ] F. OTHER _____ (Specify)

CONTRACTOR NAME (S)

02 SITE STATUS (Check one)

[X] A. ACTIVE [ ] B. INACTIVE [ ] C. UNKNOWN

03 YEARS OF OPERATION

1960 (BEGINNING YEAR) | Pres (ENDING YEAR) [ ] UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Analysis of ground water in March 1983 from on-site and off-site wells revealed contamination by methylene chloride. Soil samples analyzed in 1983 revealed the presence of organic compounds. (B,D,F)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Off-site ground-water contamination has been detected. The potential for contamination of water supply wells exists. Soil contamination was also discovered on-site. (Attachments B,D)

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

[ ] A. HIGH (Inspection required promptly) [X] B. MEDIUM (Inspection required) [ ] C. LOW (Inspection on time available basis) [ ] D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Fred Schmitt	NJDEP/BEERA	(609)-2921215

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Soterios Stavrou		JRB Assoc.	(201)-5990100	2/14/85 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
NJ	87

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- [X] A. SOLID
- [ ] B. POWDER, FINES
- [ ] C. SLUDGE
- [ ] D. OTHER (Specify)
- [ ] E. SLURRY
- [X] F. LIQUID
- [ ] G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TONS
CUBIC YARDS Unknown
NO. OF DRUMS Unknown

03 WASTE CHARACTERISTICS *(Check all that apply)*

- [X] A. TOXIC
- [ ] B. CORROSIVE
- [ ] C. RADIOACTIVE
- [ ] D. PERSISTENT
- [X] E. SOLUBLE
- [ ] F. INFECTIOUS
- [X] G. FLAMMABLE
- [ ] H. IGNITABLE
- [X] I. HIGHLY VOLATILE
- [ ] J. EXPLOSIVE
- [ ] K. REACTIVE
- [ ] L. INCOMPATIBLE
- [ ] M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	Unknown		
IOC	INORGANIC CHEMICALS	Unknown		
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	Unknown		

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	Toluene	108-88-3	Soil	220,000	ppb
SOL	1,1,2,2 Tetrachloroethane	79-34-5	Soil	180,000	ppb
SOL	Xylenes	999	Soil	28,000	ppb
SOL	Ethyl benzene	100-41-4	Soil	21,000	ppb
SOL	Trichloroethylene	79-01-6	Soil	15,000	ppb
SOL	1,1,1 Trichloroethane	71-55-6	Soil	12,000	ppb
SOL	Chloroform	67-66-3	Soil	7,600	ppb
SOL	Benzene	71-43-2	Soil	6,000	ppb
OCC	Methyl isobutyl ketone	999	Drum	94,000	ppb
OCC	Diethyl phthalate	84-66-2	Drum	44,000	ppb
MES	Lead	7439-92-1	Drum	45,000	ppb
(Attachment F)					

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references, e.g. state files, sample analysis, reports)*

NJDEP/DWM, HSMA, DWR Files: Attachment F

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE: NJ	02 SITE NUMBER: 87

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 [X] OBSERVED (DATE: 3/1/83) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Analyses of ground-water samples revealed presence of volatile organic chemicals. (Attachments D and G)

01 [X] B. SURFACE WATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Potential exists from migration of contaminated ground water. (Attachment D)

01 [ ] C. CONTAMINATION OF AIR — 02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS — 02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 [X] E. DIRECT CONTACT — 02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Potential exists for direct contact from consumption of contaminated ground water. (Attachment D)

01 [X] F. CONTAMINATION OF SOIL — 02 [X] OBSERVED (DATE: 3/17/83) [ ] POTENTIAL [ ] ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

Analyses of soil samples revealed the presence of volatile organic chemicals. (Attachment F)

01 [X] G. DRINKING WATER CONTAMINATION — 02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Wells of five of Diamond Aerosol's neighbors revealed the presence of methylene chloride. (Attachment D)

01 [ ] H. WORKER EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE: _____) [ ] POTENTIAL [ ] ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 [X] I. POPULATION EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE: _____) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Potential exists for exposure from consumption of contaminated ground water. (Attachment D)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: NJ | 02 SITE NUMBER: 87

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES (Spills/runoff/standing liquids/leaking drums) — 02 ☒ OBSERVED (DATE: 2/16/83) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION
Buried drums containing hazardous substances were discovered on-site. Ground water and soil on-site are contaminated with organics. (Attachments B,D,F)

01 ☒ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE:) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Ground water both on-site and off-site was found to be contaminated with methylene chloride. (Attachment D)

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

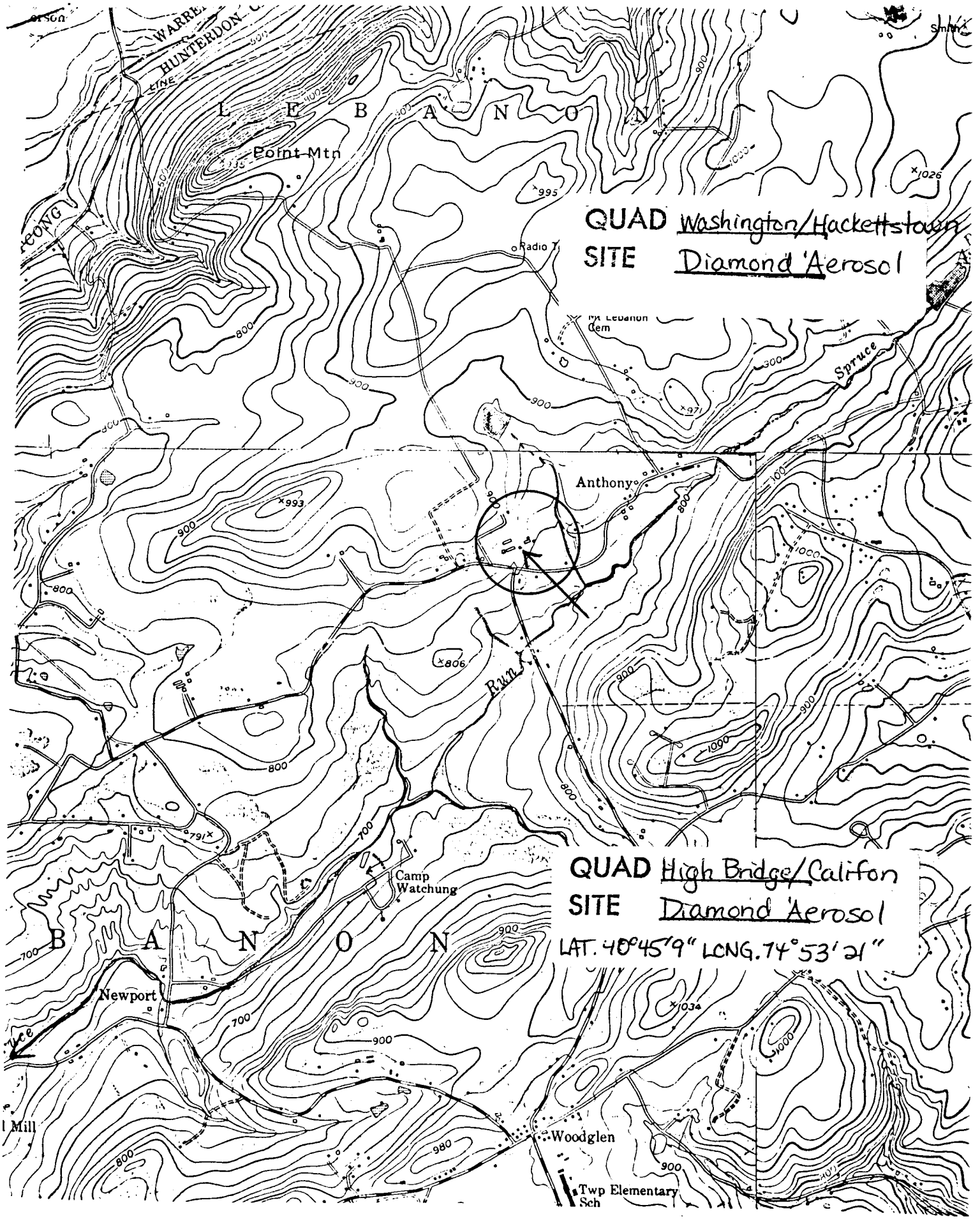
01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☒ OBSERVED (DATE: 2/16/83) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
Buried drums containing hazardous substances were discovered on-site. An unpermitted discharge to subsurface disposal system was observed in 1980. (Attachments A,B)

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED:

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)
NJDEP/DWM, HSMA, and DWR (Geo): Attachments A,B,D-J
USEPA (Federal Plaza): Attachment C


QUAD Washington/Hackettstown
SITE Diamond 'Aerosol
QUAD High Bridge/Califon
SITE Diamond 'Aerosol
LAT. 40°45'9" LONG. 74°53'21"
LEBANON
Point Mtn
Radio T
Mt Lebanon Cem
Spruce
Anthony
Run
Camp Watchung
BANON
Newport
Woodglen
Twp Elementary Sch
HUNTERDON
LINE

Unit 4 unit

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Tony Farro ✓

FROM Edward Putnam DATE 10/29/80

SUBJECT Possible Buried Drums, Diamond Aerosol, Glen Garden, Hunterton County

This case was forwarded to me by Bob Reed through Wayne Howitz. The part of the letter which concerns us is circled on page two.

I called Al Valencia, 2-0566, he informed me that on reinspection he found no evidence of buried drums and no area that looked like an old dump. I also called Mr. Ralph Helmrich, Vice President, Diamond Aerosol (201-832-7128). He said that Mr. Valencia just over reacted when he saw an old crushed drum in a mound of dirt. I asked if he had any further information of the "Chemical Research Company", he said the company was Electro-organic and they manufactured pharmaceutical intermediates. He also stated he worked for them and that most of their waste chemicals were neutralized and disposed of (probably in the subsurface system).

I recommend that this just be filed into memory and further investigated only if a problem arises in the area.

EP:lc
cc David Henderson

ATTACHMENT A

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WATER RESOURCES

TRENTON, NEW JERSEY 08625

Arnold Schiffman
Director

Ralph Helmrich, Vice President
Diamond Aerosol Company
Woodglen & Anthony Road
Glen Gardner, New Jersey 08826

201 832 7126

JUN 16 1980

Re: Industrial Waste Disposal Problem
Diamond Aerosol Company
Lebanon Township

Dear Mr. Helmrich:

On May 28, 1980, representatives of this office conducted an inspection of your industry. The inspection was prompted by a complaint received in this office concerning a red discharge from Diamond Aerosol Company into a tributary of the Spruce Run. Both you and Mr. George Diamond, President, were interviewed during the inspection.

It was ascertained during the inspection that Diamond Aerosol packages mens' and womens' cosmetics and individual tear gas dispensers. The products are mixed in some cases and in other cases the premixed material is shipped in and packaged. You and Mr. Diamond stated that there is no discharge to surface water. The compressor cooling water is on a closed loop system and cooling water from jackets in some of the mixing tanks, as well as mixing tank and floor wash-up water, is discharged to a subsurface disposal system. It was further ascertained that there are no plans and specifications on the subsurface disposal system.

An inspection, of the area where the subsurface disposal system is located, was made and a considerable discharge was noted. Although the discharge was clear, the ditch that had formed as a result of this discharge, contained a residue of various colored material. In addition, it appeared that a red substance had been dumped and flowed into the ditch. This red material had apparently been washed into the stream by the discharge from the subsurface disposal system. It was learned that the discharge was a result of the discharge of cooling water from a jacket of one of the mixing tanks. You stated that you were unaware of the discharge and attributed it to either a broken pipe or a clogged underdrain system.

ATTACHMENT: A-2

Also noted in this area was solid waste material that should have been taken to a landfill but has been discarded. This material must be cleaned up and disposed of in a landfill.

Also discussed during the inspection was the fact that prior to Diamond Aerosol locating on this site, approximately 20 years ago, a chemical research company was located here and apparently discharged their waste in a subsurface disposal system. This chemical research company is reported to have buried drums on this site, and Mr. Diamond stated that when he established the company there, he found three or four drums. Since Mr. Diamond was not present during all of the inspections and you did not know the exact location of where the buried drums were, an attempt was made to locate this area but was unsuccessful. Please consult with Mr. Diamond and advise this writer of the exact location of the buried drums.

During the inspection, you were advised to determine why the present unpermitted discharge exists and to take the necessary steps to eliminate it. You were further advised that cooling water should not be discharged into a subsurface disposal system. Cooling water of this type can be discharged into a stream. However, an NPDES (National Pollutant Discharge Elimination System) permit is necessary for the discharge. I would strongly suggest that you eliminate the subsurface cooling water discharge and apply to the USEPA for a permit application. To obtain a permit application, write to the USEPA, Permits Administration Branch, Region II, 26 Federal Plaza, New York, New York 10007. Please copy this office with all correspondence between you and the USEPA.

Concerning the wastewater from the cleaning of the mixing tanks and the floor drains, this type of waste is classified as industrial waste and cannot be disposed of in a subsurface disposal system without the approval of this Department. Section 7:9-2.8 (page 9), Standards for the Construction of Individual Subsurface Sewage Disposal Systems (copy enclosed) states in part that:

> Industrial wastes shall not be discharged into individual sewage disposal systems without special approval of the Administrative Authority and the Department.

It is my opinion that the existing subsurface system is not working because waste that has entered the system over the years has clogged up the system causing the discharge. It will be necessary to either have a new subsurface system installed or make corrections to the existing system. In either case, you must submit the plans and specifications to this office for review and approval. For more information on the submittal, please contact Mr. Joseph Benintente of the Groundwater Management Section at (609) 292-0424.

ATTACHMENT A-3

Another alternative would be to install a holding tank, if this is feasible, to contain the waste and have it hauled off site by a licensed waste acceptance firm. The waste would have to be hauled on a regular basis,and Diamond Aerosol Company would be held responsible for any discharge or overflow from the holding tank.

You are therefore directed to respond in writing within two weeks of receipt of this letter. Your response must explain in detail the steps you have taken and intend to take to resolve your problems. Furthermore, please include all tne information you can obtain on the location of any drums that still may be buried on the property.

Very truly yours,

Alfred W. Valencia

Alfred W. Valencia
Supervising Environmental Technician
Region V
Western Bureau of Compliance
Enforcement Element

A2:G9

Enclosure

cc: Hunterdon County Health Department
South Branch Watershed Association
Robert Reed, Hazardous Dump Mitigation
Joseph Benintente, Groundwater Management
USEPA Region II - Permits Administration Branch

ATTACHMENT A-4

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
120 Rt. 156, CN 402, Yardville, N.J. 08625

JACK STANTON
DIRECTOR

LINC F. PEREIRA
DEPUTY DIRECTOR

IN THE MATTER OF
DIAMOND AEROSOL CORPORATION

ADMINISTRATIVE CONSENT ORDER

The following findings are made and ORDER issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (NJDEP) by N.J.S.A. 13:1D-1 et seq., the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11(a) et seq, and the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and duly delegated to the Assistant Director for Enforcement and Field Operations, Division of Waste Management under N.J.S.A. 13:1B-4.

FINDINGS

1) Diamond Aerosol Corporation (Diamond Aerosol) is a manufacturer of various products including, but not limited to fragrances, cosmetics, caulking compound, lens cleaner and tear gas and is located at Wood Glen and Anthony Roads (Lot 23, Block 57) Glen Gardner, New Jersey.

2) An inspection conducted of Diamond Aerosol's facility by Department personnel on January 27, 1983, revealed that the facility generates hazardous wastes and hazardous substances in the following ~~manner~~:

   a) Wash solutions containing fragrance product and ~~isopropanol~~ isopropyl alcohol ~~acetone~~ are created through the cleansing of manufacturing vats.

   b) Tear gas manufacturing and packaging operation generates the tear gas waste, orthochorlobenzalmalomonitrile i.e. "c.s." + garbage

   c) The cleanup of product spills that occur during normal manufacturing operations generates hazardous wastes. treated to air + garbage

3) On February 3, and February 16, 1983, department personnel were present during on-site excavations of suspected drum depositories. Said excavations revealed the presence of buried drums. The drums were sampled for analysis. Analyses of the drums by Stablex-Reutter, Inc. showed the presence of hazardous substances (copies of said analyses dated March 11, 14 and 31, 1983, are attached hereto as Exhibits A, B and C).

4) On February 7, 1983, the Division of Water Resources, N.J.D.E.P., issued a letter to Diamond Aerosol concerning its January 13, 1983 National Pollutant Discharge Elimination System (NPDES) Permit inspection. Diamond Aerosol's facility received a "conditionally

ATTACHMENT B

acceptable" rating due to Diamond Aerosol's failure to report a spill from tank mixing and cleaning operations.

5) On March 17, 1983, department personnel again visited the site. Soil samples were obtained from areas of confirmed or suspected dumping. Analysis of the soil samples by Stablex-Reutter, Inc. revealed the presence of hazardous substances (a copy of said analysis, dated May 6, 1983, is attached hereto as exhibit D).

6) On April 7, 1983, department personnel visited the site again and discovered drums of a various substances stored on-site. Samples were taken for analysis. Analyse of the drums by Stablex-Reutter, Inc. revealed the presence of hazardous substances. As of the date of this Order, said drums were located on-site. (a copy of said analysis dated May 18, 1983, is attached hereto as Exhibit E.)

7) On May 2, 1983, department personnel further inspected the site. Samples of the soil in the area of the septic tank leaching field were taken. Analysis of the soil samples showed the presence of hazardous substances (a copy of said analysis dated July 13, 1983, is attached hereto as Exhibit F).

8) On May 27, 1983, department personnel again inspected the site. Samples of the on-site septic tank were taken. Samples taken from the septic tank were analyzed by the New Jersey Department of Health and revealed the presence of volatile organics substances (a copy of said analysis dated June 13, 1983, is attached hereto as Exhibit G).

9) On June 14, 1983, Diamond Aerosol was issued a directive letter whereupon Diamond Aerosol was directed to 1) submit a revised NJPDES permit application; 2) to identify the exact location of the floor drain discharge in the tear gas room; and 3) seal all floor drain openings to prevent contaminants from flowing into them.

10) On June 29, 1983, department personnel again inspected the site. The septic system was again sampled and analyzed by the New Jersey Department of Health. The analysis revealed the presence of volatile organic substances (a copy of said analysis is attached hereto as Exhibit H).

a) On June 29, 1983, Department personnel also sampled Diamond Aerosol's "001 surface water discharge", laboratory sink trap and hot water bath conveyor.

All of the above samples were analyzed by the New Jersey Department of Health Laboratory and revealed the presence of volatile organics (a copy of said analyses is attached hereto as Exhibit I).

11) As a result of the above, Diamond Aerosol is found to have violated the following New Jersey statutes and regulations:

ATTACHMENT B-2

#87

DIAMOND AEROSOL CORPORATION GLEN GARDNER, NEW JERSEY 08826 TELEPHONE 201 832-7128

June 5, 1981

ENVIRONMENTAL PROTECTION AGENCY
Region II
Information Service Center
26 Federal Plaza
New York, N.Y. 10007

Re: Consolidated Permits Program
RCRA
EPA ID #NJ049644438

Sir:

After a good deal of investigation, we have found, on our facility, a small abandoned land fill site. Our investigations indicate that this landfill occupies an area approximately 50' x 100' or less. Our information indicates that the landfill contains waste laboratory reagents and chemicals probably not exceeding 1,000 pounds and discarded aerosol containers, total volume probably not exceeding 1,000 cubic feet. The landfill consisits of a series of slit trenches approximately 6 feet deep with a 4 foot earth cover over the discarded material.

The enclosed site sketch shows the approximate location of this landfill.

We also found in a nearby overgrown area approximately 20 drums of chemicals hidden in the brush. These drums are being recovered for proper disposal.

Please amend our application to indicate the above mentioned land fill.

Sincerely,

DIAMOND AEROSOL CORPORATION

Ralph H. Helmrich
Vice President

Attachment C

EPA Notification of Hazardous Waste Site

Agency
Washington DC 20460

filed 6/5/81 87

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: DIAMOND AEROSOL CORPORATION

Street: Woodglen & Anthony Road R.D. #1

City: Glen Gardner, State: N.J. Zip Code: 08826

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: see above

Street:

City: County: State: Zip Code:

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Helmrich, Ralph Vice President

Phone: 201-832-7128

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1960 To (Year): 1977 latest suspected date

E Waste Type: Choose the option you prefer to complete

Option I: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☒ Organics
2. ☒ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

_____

_____

_____

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☒ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

_____

_____

_____

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

Form Approved
OMB No. 2000-0138
EPA Form 8900-1

ATTACHMENT C-2

F. Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☒ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☐ Other (Specify) _____

Total Facility Waste Amount

cubic feet: less than 1,000

gallons: _____

Total Facility Area

square feet: _____

acres: approximately 1

Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

See RCRA - Consolidated Permits Program - Form #3

as amended

Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

The site was used for disposal of small quantities of chemicals and laboratory reagents as well as out of specification filled aerosol containers. The said aerosol containers comprise 90% of the total material. Material is buried in slit trenches 4-8 feet down.

J. Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name: Ralph H. Helmrich

Street: _____

City: _____ State: _____ Zip Code: _____

Signature: [signature] Date: 6-4-81

☐ Owner, Present
☐ Owner, Past
☐ Transporter
☑ Operator, Present
☐ Operator, Past
☐ Other

ATTACHMENT C-3

MEMO NEW JERSEY STATE DEPARTMENT ENVIRONMENTAL PROTECTION

TO Bruce Venner through George Smadja, Supervisor, and Ron Corcory, Chief, Bureau of Field Operations, Division of Waste Management

FROM Steven Spayd through William F. Althoff and Haig F. Kasabach, Deputy State Geologist, New Jersey Geological Survey DATE March 26, 1983

SUBJECT Diamond Aerosol, Inc., Lebanon Township, Hunterdon County — Suspected Ground Water Contamination and Monitoring Requirements

Background

It has been confirmed that drums were buried on this site. During exploratory excavations seven drums were uncovered. The Division of Waste Management representatives observing the excavations obtained samples for analyses. The analyses have yet to be completed. According to Diamond Aerosol, contents of the drums may have included caulking compound, latex adhesive, latex sealent, nail polish remover and orthovannillin. The site has very poor housekeeping. Many areas of the site have been filled to their present grade. An old garbage-burning area has many buried aerosol cans and semi-plastic green cosmetic material.

Diamond Aerosol has a permitted NPDES discharge for non-contact cooling water; however, floor drains may also be connected to this discharge. During my site visit of 17 March 1983 the discharge had a slightly milky look and the pool of discharge downgradient of the discharge point had an oily sheen. It should be noted that this NPDES discharge is not to surface waters but rather to the ground water. The discharge waters currently run down a short slope to a swampy area where they seep into the ground.

Hydrogeology

The site is underlain by highly weathered Precambrian gneiss bedrock. The natural overburden above the bedrock varies in thickness from a few inches near the excavation for the proposed warehouse at the northern end of the site to about 8 feet near Anthony Road. The overburden may be thicker than 8 feet in areas that have been filled. The water table across the site varies from the ground surface to a depth of ten feet. Ground water flow across the site is probably in a southeasterly direction.

Wells and Well Sampling

All of the water supplies in the area around the Diamond Aerosol Plant are from individual private wells. The plant itself derives water from a 150-foot deep well which has 59 feet of protective steel casing.

~~Diamond~~ Aerosol's well and wells of five neighbors, selected by the South Branch Watershed Association, were sampled on March 1, 1983. These analyses showed contamination by methylene chloride. A resampling by the Bureau of Potable Water on March 9, 1983 showed only background levels.

The County Health Department has since resampled these wells and another 25 wells in the area. Although I have not received the results of this sampling, most of it was probably unnecessary as the area of ground water which could be potentially affected by Diamond Aerosol is not that extensive. The County has agreed not to take any more samples without contacting NJDEP for advice on sampling locations.

ATTACHMENT D

57

Conclusion

The buried drums, poor housekeeping and NPDES discharge have undoubtedly affected the ground water beneath the Diamond Aerosol site. After the sources of contamination are removed, what needs to be done is to define the contaminants, their concentration, and their extent within the bedrock aquifer.

Recommendations

1. The buried drums and any associated contaminated soil should be excavated and disposed of according to Department regulations.

2. Site housekeeping must be improved - all scrap drums and miscellaneous debris should be disposed of or stored properly.

3. The NPDES discharge should be sampled for possible floor drain contamination. The discharge should be extended to a surface water stream or a permit for ground water discharge applied for.

4. A sample should be taken from the plant's septic system to determine if any industrial wastes have been discharged to it.

5. Seven (7) monitor wells should be installed on the Diamond Aerosol site. These wells should be installed according to NJDEP specifications (attachment A), to determine the degree and extent of ground water contamination and the ground water flow rate and direction.

6. The monitor wells should be located as shown on Attachment B. The final locations should be approved by a NJGS geologist before installation. The geologist should be notified of the drilling date at least two (2) weeks prior to drilling.

7. The monitor wells should be installed in the gneiss bedrock. The open bedrock borehole should extend at least 15 feet below the water table.

8. After completion of the wells, water samples should be taken for, at a minimum, those compounds found in the buried drums and other compounds thought to have been discharged to the ground or otherwise used on the site.

9. Static ground water elevations should be measured in the monitor wells for development of a water table contour map.

10. A hydrogeologic consultant should be contracted by Diamond Aerosol to oversee the above work and to submit a proposal to NJDEP detailing the methods to be used in the investigation, and time schedule for implementation.

If you have any questions or require further clarification please call me at 2-0668.

I will continue to assist in this case as needed.

SS:clb

Attachments

cc: Nicholas Binder, Chief, Region V Enforcement
Bill Laffey, Bureau of Potable Water
John Trela, Bureau of Ground Water Discharge Permits

ATTACHMENT D-2

Phone: 609-541-6700
Telex: 834477

Stablex-Reutter Inc.

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

Analytical Results

The parameters analyzed and results are delineated in the following tables. The interlaboratory variability of the parameters analyzed in the type(s) of sample matrix submitted has not been substantiated by EPA and is probably at least ± 20%.

A. Miscellaneous Analysis

	SR8119-1 BV054	SR8119-2 BV055	SR8119-3 BV056
Flashpoint, °F, Closed Cup	97	<70,<70*	<70
pH, units	6.01	3.42	5.16,5.14

* Duplicate Analysis

Reactivity

The observations for Reactivity are as follows:

- The samples did not undergo violent changes under normal conditions.
- The samples did not react violently or form a potentially explosive mixture with water.
- The samples did not appear readily capable of detonation or exposive decomposition or reaction at standard temperature or pressure.
- The determination of cyanide and sulfide follows:

	Sample and Designation		
Parameter	SR8119-1 BV054	SR8119-2 BV055	SR8119-3 BV056
Sulfide, ug/g	<5	<5	<5
Cyanide, ug/g	<10	<10	<10

ATTACHMENT E

Phone: 609-541-6700
Telex: 834477

Stablex-Reutter Inc.

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

B. Inorganic Analysis

EPA-EP Results

Sample and Designation

Constituent	SR8119-1 BV054	SR8119-2 BV055	SR8119-3 BV056	EP Toxicity Limits
Arsenic, total	<0.05	<0.05	<0.05	5.0
Barium, total	<0.1	<0.1	<0.1	100.0
Cadmium, total	<0.01	<0.01	<0.01	1.0
Chromium, total	<0.05	<0.05	<0.05	5.0
Lead, total	<0.05	<0.05	<0.05	5.0
Mercury, total	<0.002	0.013	0.018	0.2
Selenium, total	<0.01	<0.01	<0.01	1.0
Nickel, total	<0.05	<0.05	<0.05	---
Silver, total	<0.05	<0.05	<0.05	5.0

(Above results are in milligrams constituent per liter of EP Extract (ppm).

Quality Assurance Data

Parameter	SR8119-1 Duplicate	SR8119-3 + Spike: Amount of Spike, ppm	SR8119-3 + Spike: % Recovery
Arsenic	<0.05	1.0	120
Barium	<0.1	1.0	83
Cadmium	<0.01	1.0	104
Chromium	<0.05	1.0	98
Lead	<0.05	1.0	93
Mercury	---	0.1	95*
Selenium	<0.01	1.0	115
Silver	<0.05	1.0	101
Nickel	<0.05	1.0	78

*This spike was performed on sample no. SR8102, analyzed simultaneously with the samples in this Test Report.

ATTACHMENT E-2

Stablex-Reutter Inc.

"SOLUTIONS START HERE"

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

Phone: 609-5
Telex:

87

Acid Extractable Organics (Method 625 by GC/MS)

Sample and Designation

Constituent	SR8053 BV049A
Phenol	<1.0
2-Nitrophenol	<1.0
4-Nitrophenol	<1.0
2,4-Dinitrophenol	<1.0
2,6-Dinitro-o-cresol	<1.0
Pentachlorophenol	<1.0
4-Chloro-3-Methyl-Phenol	<1.0
2-Chlorophenol	<1.0
2,4-Dichlorophenol	<1.0
2,4,6-Trichlorophenol	<1.0
2,4-Dimethylphenol	<1.0

Results are expressed in micrograms of constituent per gram of sample (ppm).

Acid Extractable Organics (Method 625 by GC/MS)

Quality Assurance Data

Constituent	SR8053 + Spike: Amount of Spike	% Recovery
Phenol	39	38
2-Nitrophenol	55	42
4-Nitrophenol	53	34
2,4-Dinitrophenol	98	57
2,6-Dinitro-o-cresol	73	80
Pentachlorophenol	48	27
4-Chloro-3-Methyl-Phenol	49	51
2-Chlorophenol	55	89
2,4-Dichlorophenol	63	67
2,4,6-Trichlorophenol	56	41
2,4-Dimethylphenol	53	34

Spike amounts are expressed in micrograms of constituent per gram of sample (ppm).

ATTACHMENT E-3

Stablex-Reutter Inc.

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

Phone: 609-541-6700
Telex: 834477

Purgeable Organic Compounds (Method 624) and Ketones

Sample and Designation

Constituent	SR8053 BV049A
Acrolein	<1.0
Acrylonitrile	<1.0
Chloromethane	<1.0
Bromomethane	<1.0
Vinyl chloride	<1.0
Chloroethane	<1.0
thylene chloride	<1.0
richlorofluoromethane	<1.0
1,1-Dichloroethylene	<1.0
1,1-Dichloroethane	<1.0
rans-1,2-Dichloroethylene	<1.0
hloroform	7.6
,2-Dichloroethane	<1.0
,1-Trichloroethane	12
bon tetrachloride	<1.0
romodichloromethane	<1.0
,2-Dichloropropane	<1.0
rans-1,3-Dichloropropene	<1.0
richloroethylene	15
ibromochloromethane	<1.0
enzene	6.0
,1,2-Trichloroethane	<1.0
is-1,3-Dichloropropene	<1.0
hloroethylvinyl ether	<1.0
omoform	<1.0
,1,2,2-tetrachloroethane	180
etrachloroethylene	<1.0
oluene	220
lorobenzene	<1.0
hyl Benzene	21
lenes	28
thyl Ethyl Ketone	<1.0
thyl Isobutyl Ketone	<1.0

sults are expressed in micrograms of constituent per gram of sample
pm).

ATTACHMENT E-4

09-02

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO George Smajda

FROM Bruce Venner DATE 5/25/83

SUBJECT Diamond Aerosol sampling information

Diamond Aerosol sampling information to date - 5/25/83. Copies of all samples were given to Ralph Helmrich.

2/3/83 sample MAN124A collected. Sample obtained from a 30 gallon drum found during exploratory excavation in the NE corner of facility.

Significant analytical results

Methyl Isobutyl Ketone	94 ppm
Phenol	34 ppm
Diethyl Phthalate	44 ppm
Trichloroethylene	1.7 ppm
Toluene	2.1 ppm

2/15/83 sample BV047 collected on the western side of the barn. Mr. Helmrich stated that the green crystalline material was probably ortho-vanillin.

This sample has not been analyzed.

2/15/83 sample BV048 collected from a 55 gallon drum which was excavated from the drum dump located on the western side of the barn.

Significant analytical results

Diethyl Phthalate	91 ppm
Di-N-Butyl Phthalate	23 ppm
Toluene	2.6 ppm
Ethyl Benzene	3.2 ppm
Lead	45 ppm
Thallium	34 ppm
Zinc	22 ppm

2/15/83 sample BV049A collected from soil which had been excavated from the drum dump on the western side of the barn.

This sample has not been analyzed.

3/17/83 the second sample BV049A collected in the northeastern corner of the facility at a depth of approximately 1 1/2 feet using a soil auger. This sample (3/17/83 has been analyzed and this can be confirmed by checking the dates on the chain of custody form.

ATTACHMENT F

Diamond Aerosol sampling information
5/25/83

Significant analytical results

Chloroform	7.6 ppm
1, 1, 1-Trichloroethane	12 ppm
Trichloroethylene	15 ppm
Benzene	6.0 ppm
1, 1, 2, 2 Tetrachloroethane	180 ppm
Toluene	220 ppm
Ethyl Benzene	21 ppm
Xylenes	28 ppm

3/17/83 the following samples were also collected on 3/17/83.

BV050A - soil sample collected from ground surface on the NE corner of property where grass appeared chemically burned. This sample has not been analyzed.

BV051A - soil sample collected from a depth of approximately 4 feet in the area of the old burning pit. This sample has not been analyzed.

BV052A - soil sample collected on the western side of the barn. Sample was collected at a depth of approximately 3 feet. This sample has not been analyzed.

BV053A - soil sample collected on the western side of the barn at a depth of approximately 3 feet. This sample has not been analyzed.

4/7/83 - samples BV054, BV055, BV056 were all composite samples collected from the drums of vat wash waste stored in the northeastern corner of the facility. All drums which were sampled were given DEP sample labels. The following is a list of label numbers which correspond to sample numbers:

BV054 is a composite of 1074, 1075, 1076, 1070, 1069, 1058, 1059. Closed cup flash point 97^{o}F.

BV055 is a composite of 1057, 1077, 1056, 1060, 1061, 1062, 1063. Closed cup flash poine 70^{o}F.

BV056 is a composite of 1066, 1065, 1067, 1064, 1225, 1227. Closed cup flash point 70^{o}F.

These samples are all considered as hazardous wastes based on NJAC 7:26-8.9(a)1, Ignitability. This is pending a classification letter from Dave Schrier's office.

5/2/83 - two soil samples collected from the septic leach field both at a depth of approximately 3 feet and assigned sample numbers BV057 and BV058. Sample BV057 was collected on the western side of the leach field and sample BV058 was collected on the eastern side of the leach field. Both samples have been sent out for analysis.

11/19/81 - two liquid samples collected by Charles Elmendorf and assigned sample numbers CE062 and CE063. Sample CE062 was collected from a spilled material of unkncwn origin and CE063 was collected from a surface discharge from the leach

ATTACHMENT F-2

Diamond Aerosol sampling information
5/25/83

field located on the eastern side of the warehouse. According to Dave Schrier, these spills would now be considered hazardous material spills.

Significant analytical results

CE062

Oil and grease	640 ppm

CE063

Oil and grease	2300 ppm

ATTACHMENT F-3

DIAMOND AEROSOL CORPORATION

Results of Analyses on Water Samples* (11/28 & 11/29/83)
Monitoring Wells No. 1 Thru 7

SUMMARY**

Parameter***	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-
cloroform	6.6		52				
flourotrichloromethane	4.3	26		15	21 ↘		
1,1,1,-trichloroethane		24	46				
chloroethane		6.7					
benzene			3				
1,1-dichloroethane			2.7				
ethlybenzene			21				
methylene chloride			8.9				
toluene			13				
acetone			4				
tetrachloroethylene					11 ↘		
Subtotal	10.9	56.7	150.6	15	0	32	
TOC (mg/l)	3	4	86	5	2	7	

* Reported in ug/l (ppb) unless indicated otherwise.

** All other parameters listed in Exhibit E of the ACO were not detected or were within the limits of detection of the test.

*** See next page for detection limits.

ATTACHMENT 6

[redacted]

Original signed & mailed

THROUGH: George Smajda, Supervisor, Division of Waste Management
Joseph A. Miller, Assistant Chief, Northern Region
Isabel M. Szumski, Assistant Env. Engineer
Northern Region

DEC 6 1983

Inspection of Diamond Aerosol Corporation
Lebanon Township, Hunterdon County

On November 7, 1983, the writer and Steve Spayd, Geologist visited Diamond Aerosol Corporation in Lebanon Township. The purpose of the visit was to observe the installation of the ground water monitoring wells and inspect the site.

An inspection of the area near MW#6 revealed 2-3 crushed drums. In order for the area near MW#6 to be accesible, a driveway was excavated. The driveway was excavated in such a way as to form a 4 foot wall on both sides finally dropping off to become level with the ground surface where MW#6 is located.

Approximately 6-10 feet from the beginning of the driveway, 2-3 drums were observed to be situated in the wall of the driveway at approximately three feet above the ground surface.

These drums were crushed with signs of rusting. No labels or markings were visible. Soil near the drums revealed some contamination but there was no sign of any type of substance leaking from the drums. The soil near the drums appeared to be a darker brown color while the original soil was a reddish brown color. No odors were noticed. Proceeding in the rear of the property, near a storage area, a spill of 3-5 gallons of liquid was observed. The spill had the smell of perfume, and bubbles (foam) were also observed.

The writer and Steve Spayd informed Ralph Helmrich, Plant Engineer of the spill. Mr. Helmrich stated that he would talk to the person who works in that area and have the spill cleaned up.

Steve Spayd notified John Dickinson, ORS about the exposed drums near MW#6 on November 7, 1983. The Division of Waste Management was notified on November 7, 1983.

E39:G21

cc: Joseph M. Mikulka, Chief, Northern Region
Steve Spayd, Geological Survey Element
John Dickinson, ORS

ATTACHMENT 14

DEC 1983
Water Quality

57 Stin

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Fred Sickels

FROM George Smajda DATE 12 DEC 1984

SUBJECT Diamond Aerosol HW/EF 10-19-04

On December 6, 1984, I went to the Diamond Aerosol facility in Glen Gardner for a general inspection. I was accompanied by Bill Sharples from the Bureau of Hazardous Waste Engineering and Permits. Mr. Sharples wished to tour the facility and discuss with Mr. Helmrich the procedures for closure of the facility's RCRA operations. Additionally, I had to discuss several items with Mr. Helmrich as well as to instruct him on the course of action in regard to the recent episode of the unauthorized depositing of "dirty soil" from the soil/container separation operation into the waste site excavation.

The day prior to this, Department representatives involved with this case, met to discuss this case in general and to formulate a desired course of action in regard to recent findings and current status of the site and remaining remedial activities to be completed. I discussed our findings and decisions with Mr. Helmrich during our meeting in Mr. Diamond's office.

Initially, we discussed the soil from the soil/canister separation operation being deposited in the waste site excavation. Mr. Helmrich stated the soil had been removed. I later confirmed this at the waste site. I informed Mr. Helmrich that in addition to this soil, the rocks previously authorized to be deposited in the waste site excavation from the soil/canister separation operation would have to be removed, as we now have concern that some contaminated soils may have also been deposited along with the rocks. Mr. Helmrich agreed to do this and further agreed that all soils removed from the waste site excavation during this operation would have to be reprocessed through the shaker.

I also explained that because this suspected contaminated soil had been deposited in what was previously declared a clean area we could no longer considered that area clean. I stated that the Department would be willing to wait for the analytical results from the proposed sampling of the contaminated soil pile after soil/canister separation is completed before we determine if further excavation and/or testing is warranted in this area. Mr. Helmrich was agreeable to this proposal. I also reminded Mr. Helmrich that one additional sample must be collected and analyzed in the area of monitoring well MW-3. I reminded Mr. Helmrich that we initially agreed to two samples from this area. I told Mr. Helmrich that we would consider the sample collected of the suspicious soil in that area as one of the two samples agreed upon. I advised Mr. Helmrich to contact Steve Spayd and coordinate this sample collection with him.

The three of us then toured the waste site area and the outside areas around the production areas. All appeared satisfactory at the waste site area. Plastic covering the suspected contaminated soils was in place.

ATTACHMENT I

ADM-012

87 HC
10-19-04 CFC

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO File

FROM Wm. Sharples WS DATE 14 DEC 1984

SUBJECT Diamond Aerosol Corporation
Glen Gardner
NJD 049 644 438

Mr. George Smajda and the writer visited the above subject facility on December 6, 1984. The facility was represented by Ralph Helmrich.

Diamond Aerosol formulates, manufactures, and packages specialty chemicals, toiletries, and tear gas for personal protection. Hazardous waste is routinely generated from reactor rinsing, off-specification product, and laboratory waste. Presently, there exists on-site drum storage. The facility is in the process of removing all drums presently stored and excavating all hazardous waste disposal of on-site illegally in the past.

The facility has requested TSD status delisting from the Department's list of hazardous waste facilities.

The facility is presently closing all hazardous waste activities on-site.

During the site visit, the facility was informed of what the Department will be requiring in the future for TSD delisting. First, the Department needs all closure information, past activities and future activities. Then, the Department must follow closure procedures found under N.J.A.C. 7:26 et seq. Finally, the facility can be eligible for delisting.

EP6/slw

c: E. Kuhlwein

ATTACHMENT 1

MALCOLM PIRNIE

OFF - SITE RECONNAISSANCE

Date: 2/13/85 Time In 10:30 AM Out 11:00 AM

Site ID No. 87

Site Name: Diamond Aerosol

Location: _____

Address: Woodglen + Anthony Rd.

City, County Glen Gardner, Hunterdon Zip: _____

Personnel: Joseph Zolla Title: Environmental Engineer

SOTERIO STAVROU Ass Environmental Eng

_____ _____

_____ _____

Conditions: Sunny + Clear Temperature: 35°F

Any evidence of imminent hazard? Unk. Illegal Dumping? Unk.

Uncapped Monitoring Wells? Unk. If Yes, Notify NJDEP

Signature: [signature] Date: 2/13/85

Witness: Soterios Stavrou Date: 2/13/85

MALCOLM PIRNIE

FIELD NOTES

Site: Diamond Acrol Site ID No. 87

Date: 2/13/85

- Extremely poor visibility from Anthony Rd.
- High foliage blocked most of the view
- Attempted to see one side of complex U w/ binoculars.
- Entered driveway to see more of site, but did not continue past main building, little additional could be seen
- Drums noticed near proximity of tank storage (ref. pic. # 1)

Signature: [signature] Date: 2/13/85

Witness: Solicitor Stanton Date: 2/13/85

87

MALCOLM PIRNIE

PHOTO LOG

Subject: Diamond Aerosol Site ID No. 87

Date: 2/13/85 Page No.

ASA: 160

Frame No:	Object photographed:*	Location of photographer:*	Compass heading:
1-5	Side of complex 11w/Anthony Rd.	Anthony Rd	N
6	Entrance	Anthony Rd.	N
7-8	Side from driveway	Entrance of complex	E

*Indicate on sketch or map if possible

Signature: [signature] Date: 2/13/85

Witness: Soheil Stavrou Date: 2/13/85

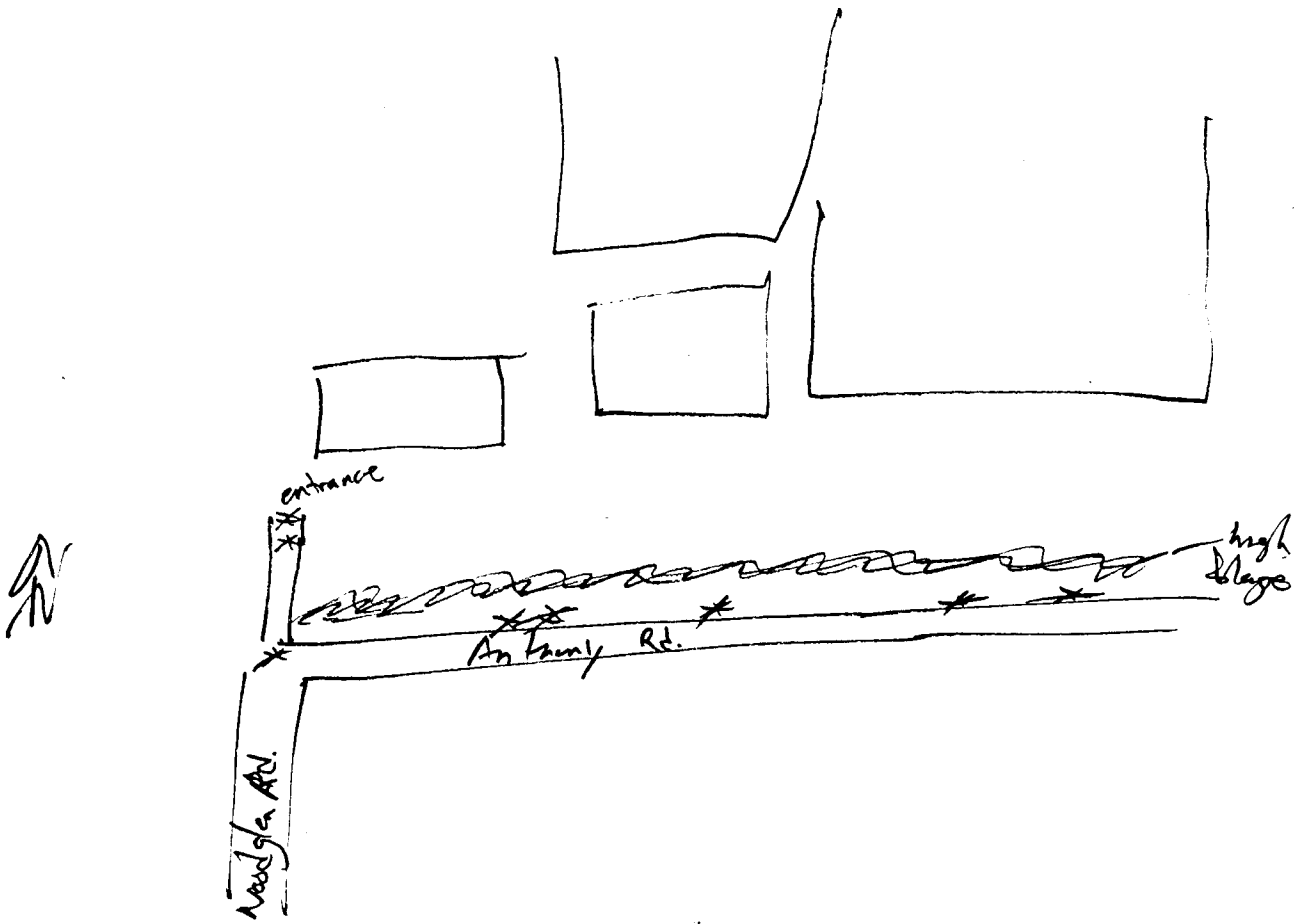
87

MALCOLM PIRNIE

MAPS AND SKETCHES

Site: Diamond Aerosol

ID No. 87



* Location of photos

Signature: _____ Date: 2/13/85

Witness: Soterios Stavrou Date: 2/13/85

MALCOLM PIRNIE

SITE NAME: DIAMOND AEROSOL

ID NO: 87

L-57
B-23

LOCATION: LEBANON TWP. GLEN GARDNER
HUNTERDON CO
ANTHONY + WOOD GLEN RD

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
DWM	1/29/85	P.K.			✓		✓	✓	✓	✓			SHOULD BE CHECKED	

CODES:

✓ REVIEWED AND COPIED
X REVIEWED BUT NOT COPIED
NF NOT FOUND

87

MALCOLM PIRNIE

SITE NAME: Diamond Aerosol

ID NO: 87

LOCATION: Lebanon Twp

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
DWR/Eco	1/30/85					✓	✓	✓	✓	✓	✓			

CODES:

✓ REVIEWED AND COPIED
X REVIEWED BUT NOT COPIED
NF NOT FOUND

87

MALCOLM PIRNIE

SITE NAME: Diamond Aerosol

ID NO: 87

LOCATION: Anthony & Woodglen Rds. Lebanon Twp.

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
HSMA	2-1	CH						✓	✓				Storch report dated 2-13-84 1½" thick report with location, buried waste excavation & removal, water & soil sampling;	

CODES:

✓ REVIEWED AND COPIED
X REVIEWED BUT NOT COPIED
NF NOT FOUND

MALCOLM PIRNIE

SITE NAME: DIAMOND Aerosol

ID NO: 87

LOCATION: Lebanon

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
EPA - Fed Plaza	1/28/85	MM	NF	✓	NF								Potential Haz. Waste Site I.D. Form Lat. 40/45/09.0 Long. 074/53/21.0	

CODES:

✓ REVIEWED AND COPIED
X REVIEWED BUT NOT COPIED
NF NOT FOUND

MALCOLM PIRNIE

Preliminary Assessment Photo Log

SITE: DIAMOND AEROSOL

I.D. 87

DATE: 2/13/85

FRAME: 8 TIME: 10:30am DIRECTION: E

DESCRIPTION: Side of plant from driveway.

FRAME: 3 TIME: 10:30 am DIRECTION: N

DESCRIPTION: Side of Complex from Anthony Road

MALCOLM PIRNIE

Preliminary Assessment Photo Log

SITE: DIAMOND AEROSOL

I.D. 87

DATE: 2/13/85

FRAME: 6 TIME: 10:30 am DIRECTION: N

DESCRIPTION: Entrance

FRAME: 7 TIME: 10:30am DIRECTION: E

DESCRIPTION: Side of plant from driveway

MALCOLM PIRNIE

Preliminary Assessment Photo Log

SITE: DIAMOND AEROSOL

I.D. 87

DATE: 2/13/85

FRAME: 5 TIME: 10:30 am DIRECTION: N

DESCRIPTION: Side of Complex from Anthony Road

FRAME: 1 TIME: 10:30 am DIRECTION: N

DESCRIPTION: Side of plant from Anthony Road

MALCOLM PIRNIE

Preliminary Assessment Photo Log

SITE: DIAMOND AEROSOL

I.D. 87

DATE: 2/13/85

FRAME: 2 TIME: 10:30 am DIRECTION: N

DESCRIPTION: Side of Complex from Anthony Road.

FRAME: 4 TIME: 10:30 am DIRECTION: N

DESCRIPTION: Side of Complex from Anthony Road